

Robert J. Herrington (SBN CA 234417)
Benjamin S. Kurtz (SBN CA 280515)
GREENBERG TRAURIG, LLP
1840 Century Park East, Suite 1900
Los Angeles, California 90067-2121
Tel: 310.586.7700; Fax: 310.586.7800
herringtonr@gtlaw.com
kurtzb@gtlaw.com

Attorneys for Defendant HEALTH-ADE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LYNETTE GONZALEZ, MICHAELA
FURDZOVA, LUCAS MARISCAL,
STEPHANIE PORTER, SEATON COLLARD,
JAMES COFFIN, LAWRENCE EBEL,
PATRICK ROJAS, SYMONE SSWEAZIE,
SARAH COWART, KYMBERLY LOVETT,
KIM MILLER, DAN SCALF, DAVID
ULERY, RICKY WRIGHT, MICHAEL
MILLER, CLAUDE VOGEL, ARLETA
KORDYLEWSKA, BROOKE TOLAN,
KEISHA WALTON, MICHELLE
GROCHOWSKI, RAQUEL PEREZ, and
SANDRA NICLAS, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

HEALTH-ADE LLC, a Delaware limited
liability company,

Defendant.

CASE NO. 5:18-cv-01836-MMC

**STIPULATION REGARDING EXTENSION
OF TIME TO RESPOND TO AMENDED
COMPLAINT (L.R. 6-1(a))**

Action Filed: March 23, 2018

Old Response Date: June 22, 2018

New Response Date: July 3, 2018

1 Pursuant to Local Rule 6-1(a), Defendant Health-Ade LLC (“Health-Ade”) and Plaintiffs Lynette
2 Gonzalez, Michaela Furdzova, Lucas Mariscal, Stephanie Porter, Seaton Collard, James Coffin,
3 Lawrence Ebel, Patrick Rojas, Symone Sweazie, Sarah Cowart, Kymberly Lovette, Kim Miller, Dan
4 Scalf, David Ulery, Ricky Wright, Michael Miller, Claude Vogel, Arleta Kordylewska, Brooke Tolan,
5 Keisha Walton, Michael Grochowski, Raquel Perez and Sandra Niclas (“Plaintiffs”; and together with
6 Defendant, the “Parties”) hereby stipulate and agree that Defendant may have an extension of time, until
7 and including July 3, 2018, to respond to Plaintiffs’ First Amended Complaint. The Parties make the
8 following recitals in support of this stipulation.

9 WHEREAS, Plaintiffs filed the Complaint in this action on March 23, 2018;

10 WHEREAS, Health-Ade was served with the Complaint on March 26, 2018;

11 WHEREAS, Health-Ade filed a Motion to Dismiss on May 18, 2018;

12 WHEREAS, Plaintiffs filed a First Amended Complaint on June 1, 2018, per Federal Rule of
13 Civil Procedure 15(a)(1), rendering Health-Ade’s Motion to Dismiss the original Complaint moot (ECF
14 21);

15 WHEREAS, Plaintiffs granted Health-Ade an extension to respond to the First Amended
16 Complaint up to and including June 22, 2018;

17 WHEREAS, Health-Ade has requested an additional, short extension of time to prepare a
18 response to the First Amended Complaint, and Plaintiffs agree that Health-Ade may have an extension of
19 time, until and including July 3, 2018, to respond.

20 WHEREFORE: the parties agree Health-Ade may have an extension of time, until and including
21 July 3, 2018, to respond to Plaintiffs’ First Amended Complaint.

22
23 ///

24 ///

25 ///

1 DATED: June 22, 2018

GREENBERG TRAURIG, LLP

2
3 By: /s/ Robert J. Herrington

4 Robert J. Herrington
5 Attorneys for Defendant
6 HEALTH-ADE LLC

7 DATED: June 22, 2018

BRADLEY GROMBACHER, LLP

8
9 By: /s/ Kiley L. Grombacher

10 Marcus J. Bradley
11 Kiley L. Grombacher
12 Taylor L. Emerson
13 Attorneys for Plaintiffs
14 LYNETTE GONZALEZ, et al.

15
ATTESTATION OF FILER

16 I, Robert J. Herrington, am the ECF user whose identification and password are being used to file
17 this STIPULATION. Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all other signatories to
18 this document concurred in its filing.

19
20 Robert J. Herrington

21 Robert J. Herrington
22
23
24
25
26
27
28